

**UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF MISSOURI  
EASTERN DIVISION**

ISRAEL SANCHEZ, Individually and On  
Behalf of All Others Similarly Situated,

Plaintiff,

v.

CENTENE CORP., MICHAEL F.  
NEIDORFF, and JEFFREY A.  
SCHWANEKE,

Defendants.

Case No. 4:17-cv-00806-AGF

**LEAD COUNSEL'S MOTION FOR  
ATTORNEYS' FEES AND LITIGATION EXPENSES**

TO: All Counsel of Record

PLEASE TAKE NOTICE that in accordance with Federal Rules of Civil Procedure 23(e) and 23(h) and this Court's Order Preliminarily Approving Settlement and Authorizing Dissemination of Notice of Settlement dated June 23, 2020, Lead Counsel will and does hereby move this Court, before the Honorable Audrey G. Fleissig, on October 26, 2020 at 10:00 a.m. Central time, for entry of an Order awarding attorneys' fees and litigation expenses. This motion is based on (a) the Declaration of Jonathan D. Uslaner in Support of (I) Lead Plaintiff's Motion for Final Approval of Settlement and Plan of Allocation, and (II) Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; (b) the Memorandum of Law in Support of Lead Counsel's Motion for Attorneys' Fees and Litigation Expenses; and (c) all other papers and

proceedings herein. A proposed Order granting the requested relief will be submitted with Lead Plaintiff's reply papers after the deadlines for objecting to the motion has passed.

Dated: September 21, 2020

Respectfully submitted,

/s/ Michael J. Flannery

**CUNEO GILBERT & LADUCA, LLP**

Michael J. Flannery  
Bar No. 52714 (MO)  
[mflannery@cuneolaw.com](mailto:mflannery@cuneolaw.com)  
7733 Forsyth Boulevard, Suite 1675  
Clayton, MO 63105  
Tel: (314) 226-1015  
Fax: (202) 789-1813

*Liaison Counsel for Lead Plaintiff Louisiana Sheriffs' Pension & Relief Fund and the Settlement Class*

**BERNSTEIN LITOWITZ BERGER & GROSSMANN LLP**

Jonathan D. Uslaner (*pro hac vice*)  
[jonathanu@blbglaw.com](mailto:jonathanu@blbglaw.com)  
Lauren M. Cruz (*pro hac vice*)  
[lauren.cruz@blbglaw.com](mailto:lauren.cruz@blbglaw.com)  
2121 Avenue of the Stars, Suite 2575  
Los Angeles, CA 90067  
Tel: (310) 819-3470

*Counsel for Lead Plaintiff Louisiana Sheriffs' Pension & Relief Fund and Lead Counsel for the Settlement Class*

**KLAUSNER, KAUFMAN, JENSEN & LEVINSON**

Robert D. Klausner  
[bob@robertdklausner.com](mailto:bob@robertdklausner.com)  
7080 NW 4th Street  
Plantation, Florida 33317  
(954) 916-1202  
(954) 916-1232 (fax)

*Additional Counsel for Louisiana Sheriffs' Pension & Relief Fund*

#1409025